

**REMARKS**

Claims 1-14, and 19 have been amended. Claim 21 has been canceled. No new claims have been added. Claims 1-20 are pending.

Claims 1-7 stand rejected under 35 U.S.C. § 101 as allegedly reciting non-statutory subject matter. The Office Action alleges that claims 1-7 do not apply, involve, use, or advance the technological arts. Claim 1 has been amended to recite, for example, creating objects on a computer. For this reason alone claim 1 recites a method which advances the technological arts. Accordingly, the rejection under 35 U.S.C. § 101 should be withdrawn.

Claims 1-21 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Cheng (U.S. Patent No. 6,067,548). The rejection is respectfully traversed.

Claim 1 recites, *inter alia*, "creating, on a computer system, a plurality of department objects ... a plurality of resource objects ... and a plurality of activity objects ... generating, by said computer system, from a set of objects comprising said department, resource, and activity objects, a workflow process management application; wherein said workflow process management application, when executed by said computer, permits a user to enter a workflow plan for said organization, receive a workflow performed by said organization, and create a report comparing said workflow plan with said workflow performed."

Claim 8 recites, *inter alia*, "a web based application ... wherein the computer, when executing the application, permits a user to: create, a plurality of department ... resource ... and ... activity objects ... and cause said computer to generate from a set of objects comprising said department, resource, and activity objects, a workflow process management application; wherein said workflow process management application

permits said user to enter a workflow plan for said organization, receive a workflow performed by said organization, and create a report comparing said workflow plan with said workflow performed.”

Claim 12 recites, *inter alia*, “An apparatus for creating a workflow process management application for an organization, comprising: a computer system ... and ... an application ... wherein the computer system, when executing said application, permits a user to: create a plurality of department objects ... resource objects ... and activity objects ... and cause said computer system to generate from a set of objects comprising said department, resource, and activity objects, said workflow process management application; wherein said workflow process management application permits a user to enter a workflow plan for said organization, receive a workflow performed by said organization, and create a report comparing said workflow plan with said workflow performed.”

Chen discloses a system for use with an organization database to support collaborative computing between different users of an organization. See, e.g., Fig. 1 and claims 1, 11, and 21. In Fig. 1, Chen illustrates a voucher approval process performed by an organization. An employee may submit a voucher (12). The voucher may be accepted (22) or rejected (24), and the employee will be notified (26) of the acceptance or rejection. Manager approval (14) is required for acceptance. Executive (16) approval may also be required. Referring to Fig. 8, Chen’s system includes a run-time system 150 which utilizes an agent program to populate a private data store 160 by pulling and parsing information from existing databases 152, employee profiles 166, and directories 154. The information of the data store 160 may be accessed by other applications via an API 162 or applet featuring a GUI via an API 164. Column 11, lines 4-58.

Chen's workflow system is therefore entirely different from the claimed invention. Claim 1 discloses a method including the steps of "creating, on said computer system, a plurality of department objects ... a plurality of resource objects ... and a plurality of activity objects" and "generating, by said computer system, from said department, resource, and activity objects, a workflow process management application." Claim 1 is therefore directed to a method of having a computer system generate a workflow process management application. Further, the generated workflow process management application "permits a user to enter a workflow plan for said organization, receive a workflow performed by said organization, and create a report comparing said workflow plan with said workflow performed." Chen fails to disclose this important aspect of the claimed invention. Chen's workflow application is merely directed to automation of existing tasks in a collaborative process via a computer system, while the claimed invention is used to create a workflow process management application useful for planning work and comparing the planned work with the actual work performed. These features are not taught or suggested by Chen. Claims 8 and 12 recite similar limitations which are also not taught or suggested by Chen.

Accordingly, claims 1, 8, and 12 are believed to be allowable over the prior art of record. The depending claims, i.e., claims 2-7, 9-11, and 13-20 are believed to be allowable for at least the same reasons as claims 1, 8, and 12.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

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